

Exhibit “A”

UNITED STATES V. EDWARD CONSTANTINESCU ET AL.

United States v. Edward Constantinescu et al.
Court Docket No.: 4:22-CR-612

Court Assigned: This case is assigned to the U.S. District Court for the Southern District of Texas, Bob Casey United States Courthouse, 515 Rusk Avenue, Houston, TX 77002.

Latest Updates: Trial is scheduled for October 23, 2023 at 9:00 AM in Courtroom 9D before Judge Andrew S. Hanen. The final pretrial conference will be held on October 16, 2023 at 8:30 AM, Courtroom 9D before Judge Andrew S. Hanen.

Criminal Charges: ^{An} ~~In an indictment unsealed on December 13, 2022, eight defendants have been charged with, among other offenses, conspiracy to commit securities fraud.~~ ^{charged} On February 8, 2023, a grand jury in the Southern District of Texas returned a superseding indictment against the same eight defendants. ~~The superseding indictment included, among other offenses, charges of conspiracy to commit securities fraud and securities fraud.~~

The defendants ~~charged in the superseding indictment~~ include Texas residents Edward Constantinescu a/k/a Constantin, Perry "PJ" Matlock, John Rybarczyk, and Dan Knight, California residents Gary Deel and Tom Cooperman, New Jersey resident Mitchell Hennessey, and Florida resident Stefan Hrvatin.

~~The superseding indictment alleges, among other things, that the defendants used social media, including Twitter and Discord, to "pump and dump" securities from in and around January 2020 to in and around April 2022.~~

Presumption of Innocence: It is important to keep in mind that a criminal indictment is merely an allegation, and defendants are presumed innocent until proven guilty ~~and that presumption requires both the court and our office to take certain steps to ensure that justice is served.~~

For more information about the charges in this case, please see below. Please note that all of the defendants have denied the allegations made in the superseding indictment below.

Superseding Indictment

Victim Impact Statement: If you would like to submit a Victim Impact Statement, you may do so by mailing the Victim Impact Statement below (or a letter to the court) to: Victim Witness Unit, U.S. Department of Justice, Criminal Division, Fraud Section, 10th & Constitution Avenue, NW, Bond Building, Room 4416, Washington, DC 20530. You also may submit the Victim Impact Statement via email at Victimassistance.fraud@usdoj.gov or by fax at: (202) 514-3708.

Victim Impact Statement (PDF)

If you believe you are a potential victim please include in your statement an identification of the specific security(ies), and trade details for each instance including, trade time(s), dates(s), number of share(s), price, whether you bought/sold, and an assessment of your gain(s) or losses associated with each trade. Please provide any supporting documentation regarding each trade(s) that you may have.